

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action

Plaintiff,

No. 2:22-cv-547

vs.

Judge Horan

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS HOLDINGS, LLC,
AMERICAN INCOME LIFE INSURANCE
COMPANY,

Defendants.

JURY TRIAL DEMANDED

**PLAINTIFF’S SUPPLEMENTAL BREIF IN SUPPORT OF MOTION FOR CONTEMPT AS
TO DEFENDANT MICHAEL RUSSIN**

AND NOW, comes the Plaintiff, Renee Zinsky, by and through her counsel averring as follows:

I. INTRODUCTION

This is a civil action brought by Plaintiff requesting relief for sexual assault, battery, false imprisonment, intentional infliction of emotional distress, defamation, and intrusion of seclusion against Defendant, Michael Russin (“Defendant Russin” or “Russin”). Defendant Russin has employed threats and intimidation tactics against Plaintiff, Plaintiff’s counsel, and Plaintiff’s witnesses relative to this matter. This Honorable Court’s decreed Defendant Russin’s conduct as intolerable. Yet, Defendant Russin continues to defy the Court and obstruct justice on a constant basis and ongoing. Plaintiff’s Motion for Contempt should be granted and Defendant Russin must be sanctioned accordingly.

II. FACTUAL BACKGROUND

Plaintiff refers this Honorable Court to her Motion for Contempt and Brief in Support and incorporates the factual background herein. *See* Plaintiff’s Motion for Contempt and Brief in Support [Doc. Nos. 68, 71.] On April 22, 2023, Plaintiff filed a Motion for Contempt as to Defendant Russin based on his ongoing violent threats and intimidation tactics relative to Plaintiff, Plaintiff’s counsel, and

Plaintiff's witnesses in this matter. *See* Plaintiff's Motion for Contempt [Doc. No. 68.] Due to the frequent, ongoing, and constant nature of Defendant Russin's conduct, Plaintiff was not able to file her Brief in Support of Motion for Contempt as to Defendant Russin until May 4, 2023. *See* Plaintiff's Brief in Support of Motion for Contempt as to Defendant Russin [Doc. No. 71.] As noted therein, supporting evidence of Defendant's threatening and violent conduct occurred as recently as the same day of filing, i.e. May 4, 2023. *Id.* at p. 7, footnote 26 [Doc. No. 49.]

Unbelievably, Defendant Russin has made even more threats of violence since Plaintiff filed her Motion for Contempt and Brief in Support thereof. For example, on May 7, 2023, Defendant Russin stated as follows:

I just dropped my gun. It's a good thing I have a glock, man. I abuse this thing.

...

I am trained and trained well ... I know how to shoot a gun very well ... When that instinct kicks in ... I could kill 10 men or more ... I'd find a pen on the ground and it would be through skulls ... A good man is highly capable of extreme levels of violence ... A good man is capable of extreme levels of violence.

...

I'm going for eyes. I'm gonna bite somebody's ear clean off the side of their head. I'm gonna be reaching down throats and pulling out their tongue by the base. I'm telling you right now ... people are gonna die. People are gonna get maimed beyond recognition if you are after me.

...

You were brainwashed by a bunch of fat women ... I'm going to mangle you so far beyond recognition that for the rest of your life, your scars will serve as a reminder of the foolishness of your decision to try to harm me... That is, if you survive.

...

I've been in some very bad altercations ... I reacted quick, swift, and very violently.¹

¹ See Russin, Michael, Absideon Achievement Podcast, "You? Fat & Broke? Never!", May 7, 2023, <https://www.podbean.com/ew/pb-pam54-13ff73b>

Similarly, on or about May 4, 2023, Defendant Russin stated as follows:

This is what happens. I buy guns and I lose money.

...

If you're in a manic episode, you literally think you're invincible. I had an episode in Covid I was wearing eyeliner. I shaved the sides of my head ... I thought I was a demon Viking ... It can spin out of control quickly...you get hyper sexual ... sometimes its violent ... it gets pretty wild ... its like demon possession ... drugs, alcohol, and sex ... all of that stuff are portals.²

III. LEGAL ARGUMENT

Plaintiff incorporates her legal argument as outlined in Plaintiff's Motion for Contempt and Brief in Support herein.

IV. CONCLUSION

Therefore, Plaintiff seeks relief from this Honorable Court in the form of sanctions as follows:

- a) Deem as contempt of Court Defendant Russin's failure to obey this Honorable Court's decree to cease and desist threatening and harassing conduct against Plaintiff;
- b) Deem the facts as designated in Plaintiff's Second Amended Complaint as established for purposes of this matter;
- c) Prohibit Defendant Russin from opposing the designated facts pursuant to Plaintiff's Second Amended Complaint;
- d) Criminal punishment for Defendant Russin, including but not limited to imprisonment, or other criminal punishment in line with the federal sentencing guidelines;
- e) Reasonable attorney's fees and costs related to the preparation of this Motion for Contempt in the amount of \$2,000.00; and,
- f) Any other relief this Court deems appropriate.

² See Russin, Michael, Absideon Achievement Podcast, "Ups & Downs", May 4, 2023. <https://www.podbean.com/ew/pb-dbe86-13fc065>

WHEREFORE, Plaintiff's counsel respectfully requests this Court grant a Plaintiff's Motion for Contempt in this matter.

Respectfully submitted,

/s/ Amy N. Williamson

Amy N. Williamson, Esq.
Pa.I.D. No. 90657
Williamson Law LLC
Law and Finance Building
429 Fourth Avenue, Suite 300
Pittsburgh PA 15219
412-600-8862
awilliamson@awilliamsonlaw.com

CERTIFICATE OF SERVICE

I hereby certify on this day of 8 May, 2023 I electronically served a copy of the foregoing **SUPPLEMENTAL BRIEF IN SUPPORT OF PLAINTIFF’S MOTION FOR CONTEMPT AS TO DEFENDANT MICHAEL RUSSIN** via the CM/ECF system which will send notification of such filing.

/s/ Amy N. Williamson

Amy N. Williamson, Esq.